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*Attorneys for Defendants Terius Gesteelde-Diamant  
and Contra Paris, LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHANA AZ MANGROE,

Plaintiff,

v.

TERIUS GESTEELDE-DIAMANT  
p/k/a “THE-DREAM”; CONTRA  
PARIS, LLC; and SONY MUSIC  
ENTERTAINMENT

Defendants.

Case No. 2:24-cv-04639-SPG-PVC

Hon. Sherilyn Peace Garnett  
Courtroom 5C

**DEFENDANTS TERIUS  
GESTEELDE-DIAMANT P/K/A  
“THE-DREAM” AND CONTRA  
PARIS, LLC’S ANSWER TO  
PLAINTIFF CHANA AZ  
MANGROE’S SECOND AMENDED  
COMPLAINT**

Action Filed: June 4, 2024  
Trial Date: None

Defendants Terius Gesteelde-Diamant p/k/a “The-Dream” and Contra Paris, LLC (collectively “Defendants”) hereby submit their Answer and Affirmative Defenses to Plaintiff Chanaaz Mangroe’s (“Plaintiff”) Second Amended Complaint (“SAC”) (Dkt. 59) as follows:

**PRELIMINARY STATEMENT**

1. Defendants admit that The-Dream is an award-winning singer, songwriter, and producer. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the SAC, and therefore deny the same.

2. The contents of the *Billboard* Magazine article alleged in Paragraph 2 Footnote 1 speak for themselves, and to the extent that the allegations in Paragraph 2 regarding the alleged article are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 2 of the SAC.

3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the SAC, and therefore deny the same.

4. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the SAC, and therefore deny the same.

5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the SAC, and therefore deny the same.

6. Deny.

7. The contents of the *New Yorker* Magazine article alleged in Paragraph 7 Footnote 2 speak for themselves, and to the extent that the allegations in Paragraph 7 regarding the alleged article are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 7 of the SAC.

1 8. Deny.

2 9. Deny.

3 10. Deny.

4 11. Deny.

5 12. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in Paragraph 12 of the SAC, and therefore  
7 deny the same.

8 13. Defendants are without knowledge or information sufficient to form a  
9 belief as to the truth of the allegations in Paragraph 13 of the SAC, and therefore  
10 deny the same.

11 **JURISDICTION AND VENUE**

12 14. The allegations contained in Paragraph 14 of the SAC are conclusions  
13 of law to which no response is required.

14 15. The allegations contained in Paragraph 15 of the SAC are conclusions  
15 of law to which no response is required.

16 **THE PARTIES**

17 16. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 16 of the SAC, and therefore  
19 deny the same.

20 17. Admit.

21 18. Defendants admit that Contra Paris, LLC is a limited liability  
22 company incorporated in Delaware and is owned and operated by The-Dream  
23 during the relevant time period. Defendants deny the remaining allegations in  
24 Paragraph 18 of the SAC.

25 19. Defendants are without knowledge or information sufficient to form a  
26 belief as to the truth of the allegations in Paragraph 19 of the SAC, and therefore  
27 deny the same.

28 / / /

**FACTUAL ALLEGATIONS**

20. Admit.

21. Admit.

22. Admit.

23. Admit.

24. Admit.

25. Deny.

26. The contents of the *Hypebeast* Magazine article alleged in Paragraph 26 Footnote 3 speak for themselves, and to the extent that the allegations in Paragraph 26 are inconsistent with that alleged article, they are denied.

27. The alleged website speaks for itself, and to the extent that the allegations in Paragraph 27 are inconsistent with that alleged website, they are denied. Defendants deny the remaining allegations in Paragraph 27 of the SAC.

28. The contents of the articles alleged in Paragraph 28 Footnote 4 speak for themselves, and to the extent that the allegations in Paragraph 28 regarding the alleged articles are inconsistent with those alleged articles, they are denied. Defendants deny the remaining allegations in Paragraph 28 of the SAC.

29. Deny.

30. Admit.

31. The contents of the *Essence* Magazine article alleged in Paragraph 31 Footnote 6 speak for themselves, and to the extent that the allegations in Paragraph 31 are inconsistent with that alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 31 of the SAC.

32. The contents of the alleged *Essence* Magazine interview speak for themselves, and to the extent that the allegations in Paragraph 32 regarding the alleged article are inconsistent with the alleged article, they are denied. Defendants deny the remaining allegations in Paragraph 32 of the SAC.

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1           33. The contents of the *BET* article alleged in Paragraph 33 Footnote 7  
2 speak for themselves, and to the extent that the allegations in Paragraph 33  
3 regarding the alleged article are inconsistent with the alleged article, they are  
4 denied. Defendants deny the remaining allegations in Paragraph 33 of the SAC.

5           34. Deny.

6           35. The contents of the alleged criminal complaint speak for themselves,  
7 and to the extent that the allegations in Paragraph 35 regarding the alleged criminal  
8 complaint are inconsistent with that alleged criminal complaint, they are denied.  
9 The contents of the alleged TMZ publication speak for themselves, and to the  
10 extent that the allegations in Paragraph 35 regarding the alleged publication are  
11 inconsistent with that alleged publication, they are denied. Defendants deny the  
12 remaining allegations in Paragraph 35 of the SAC.

13           36. The contents of the alleged public announcement speak for  
14 themselves, and to the extent that the allegations in Paragraph 36 are inconsistent  
15 with that alleged public announcement, they are denied. Defendants deny the  
16 remaining allegations in Paragraph 36 of the SAC.

17           37. The contents of the *Rolling Stone* Magazine article alleged in  
18 Paragraph 37 Footnote 8 speak for themselves, and to the extent that the  
19 allegations in Paragraph 37 are inconsistent with the alleged article, they are  
20 denied.

21           38. Deny.

22           39. Defendants are without knowledge or information sufficient to form a  
23 belief as to the truth of the allegations in Paragraph 39 of the SAC, and therefore  
24 deny the same.

25           40. Defendants are without knowledge or information sufficient to form a  
26 belief as to the truth of the allegations in Paragraph 40 of the SAC, and therefore  
27 deny the same.

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1           41. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 41 of the SAC, and therefore  
3 deny the same.

4           42. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 42 of the SAC, and therefore  
6 deny the same.

7           43. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth of the allegations in Paragraph 43 of the SAC, and therefore  
9 deny the same.

10           44. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the remaining allegations in Paragraph 44 of the SAC, and  
12 therefore deny the same.

13           45. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 45 of the SAC, and therefore  
15 deny the same.

16           46. The contents of the *Billboard* Magazine article alleged in Paragraph  
17 46 Footnote 9 speak for themselves, and to the extent that the allegations in  
18 Paragraph 46 regarding the alleged article are inconsistent with that alleged article,  
19 they are denied. Defendants are without knowledge or information sufficient to  
20 form a belief as to the truth of the remaining allegations in Paragraph 46 of the  
21 SAC, and therefore deny the same.

22           47. Defendants admit that The-Dream and/or Christopher Stewart  
23 produced and/or wrote songs for the identified singers, produced five studio  
24 albums, and received several Grammy Award nominations and multiple wins.  
25 Defendants are without knowledge or information sufficient to form a belief as to  
26 the truth of the remaining allegations in Paragraph 47 of the SAC, and therefore  
27 deny the same.

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1           48. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 48 of the SAC, and therefore  
3 deny the same.

4           49. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 49 of the SAC, and therefore  
6 deny the same.

7           50. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth of the allegations in Paragraph 50 of the SAC, and therefore  
9 deny the same.

10          51. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 51 of the SAC, and therefore  
12 deny the same.

13          52. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 52 of the SAC, and therefore  
15 deny the same.

16          53. Defendants are without knowledge or information sufficient to form a  
17 belief as to the truth of the allegations in Paragraph 53 of the SAC, and therefore  
18 deny the same.

19          54. Defendants are without knowledge or information sufficient to form a  
20 belief as to the truth of the allegations in Paragraph 54 of the SAC, and therefore  
21 deny the same.

22          55. Defendants are without knowledge or information sufficient to form a  
23 belief as to the truth of the allegations in Paragraph 55 of the SAC, and therefore  
24 deny the same.

25          56. Deny.

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1           57. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in the first sentence of Paragraph 57 of the  
3 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
4 Paragraph 57 of the SAC.

5           58. Deny.

6           59. Deny.

7           60. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth of the allegations in Paragraph 60 of the SAC, and therefore  
9 deny the same.

10          61. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 61 of the SAC, and therefore  
12 deny the same.

13          62. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 62 of the SAC, and therefore  
15 deny the same.

16          63. Deny.

17          64. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 64 of the SAC, and therefore  
19 deny the same.

20          65. Deny.

21          66. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in Paragraph 66 of the SAC, and therefore  
23 deny the same.

24          67. Deny.

25          68. Deny.

26          69. Deny.

27          70. Deny.

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1           71. The contents of the alleged text message speak for themselves, and to  
2 the extent that the allegations in Paragraph 71 are inconsistent with that alleged  
3 text message, they are denied. Defendants deny the remaining allegations in  
4 Paragraph 71 of the SAC.

5           72. Deny.

6           73. The contents of the alleged text messages speak for themselves, and to  
7 the extent that the allegations in Paragraph 73 are inconsistent with those alleged  
8 text messages, they are denied.

9           74. Deny.

10          75. Deny.

11          76. Deny.

12          77. Deny.

13          78. Deny.

14          79. Deny.

15          80. Deny.

16          81. The contents of the alleged text messages speak for themselves, and to  
17 the extent that the allegations in Paragraph 81 regarding the alleged text messages  
18 are inconsistent with those alleged text messages, they are denied. Defendants  
19 deny the remaining allegations in Paragraph 81 of the SAC.

20          82. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 82 of the SAC, and therefore  
22 deny the same.

23          83. The contents of the alleged text messages speak for themselves, and to  
24 the extent that the allegations in Paragraph 83 regarding the alleged text messages  
25 are inconsistent with those alleged text messages, they are denied. Defendants  
26 deny the remaining allegations in Paragraph 83 of the SAC.

27          84. Deny.

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1           85. The contents of the alleged text messages speak for themselves, and to  
2 the extent that the allegations in Paragraph 85 regarding the alleged text messages  
3 are inconsistent with those alleged text messages, they are denied. Defendants  
4 deny the remaining allegations in Paragraph 85 of the SAC.

5           86. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in the first sentence of Paragraph 86 of the  
7 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
8 Paragraph 86 of the SAC.

9           87. Defendants are without knowledge or information sufficient to form a  
10 belief as to the truth of the allegations in Paragraph 87 of the SAC, and therefore  
11 deny the same.

12           88. The contents of the alleged text messages speak for themselves, and to  
13 the extent that the allegations in Paragraph 88 regarding the alleged text messages  
14 are inconsistent with those alleged text messages, they are denied. Defendants are  
15 without knowledge or information sufficient to form a belief as to the truth of the  
16 remaining allegations in Paragraph 88 of the SAC, and therefore deny the same.

17           89. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 89 of the SAC, and therefore  
19 deny the same.

20           90. Deny.

21           91. Deny.

22           92. Deny.

23           93. Deny.

24           94. Deny.

25           95. Deny.

26           96. Deny.

27           97. Deny.

28           98. Deny.

1           99. Deny.

2           100. Deny.

3           101. Deny.

4           102. Deny.

5           103. The contents of the alleged text message speak for themselves, and to  
6 the extent that the allegations in Paragraph 103 regarding the alleged text message  
7 are inconsistent with that alleged text message, they are denied. Defendants deny  
8 the remaining allegations in Paragraph 103 of the SAC.

9           104. The contents of the alleged text message speak for themselves, and to  
10 the extent that the allegations in Paragraph 104 are inconsistent with that alleged  
11 text message, they are denied.

12           105. Deny.

13           106. Deny.

14           107. Deny.

15           108. Deny.

16           109. The contents of the alleged text message speak for themselves, and to  
17 the extent that the allegations in Paragraph 109 are inconsistent with that alleged  
18 text message, they are denied.

19           110. The contents of the alleged text message speak for themselves, and to  
20 the extent that the allegations in Paragraph 110 regarding the text message are  
21 inconsistent with that alleged text message, they are denied. Defendants deny the  
22 remaining allegations in Paragraph 110 of the SAC.

23           111. The contents of the alleged text messages speak for themselves, and to  
24 the extent that the allegations in Paragraph 111 are inconsistent with those alleged  
25 text messages, they are denied.

26           112. Deny.

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1           113. The alleged Instagram post speaks for itself, and to the extent that the  
2           allegations in Paragraph 113 are inconsistent with that alleged Instagram post, they  
3           are denied.

4           114. Deny.

5           115. Defendants are without knowledge or information sufficient to form a  
6           belief as to the truth of the allegations in the first three sentences of Paragraph 115  
7           of the SAC, and therefore deny the same. Defendants deny the remaining  
8           allegations in Paragraph 115 of the SAC.

9           116. Deny.

10          117. The contents of the alleged text message speak for themselves, and to  
11          the extent that the allegations in Paragraph 117 are inconsistent with that alleged  
12          text message, they are denied.

13          118. The contents of the alleged text message speak for themselves, and to  
14          the extent that the allegations in Paragraph 118 are inconsistent with that alleged  
15          text message, they are denied.

16          119. The contents of the alleged text message speak for themselves, and to  
17          the extent that the allegations in Paragraph 119 regarding the alleged text message  
18          are inconsistent with that alleged text message, they are denied. The contents of  
19          the *Essence* Magazine article alleged in Paragraph 119 Footnote 10 speak for  
20          themselves, and to the extent that the allegations in Paragraph 119 regarding the  
21          alleged article are inconsistent with that alleged article, they are denied.

22          120. Deny.

23          121. The contents of the alleged text messages speak for themselves, and to  
24          the extent that the allegations in Paragraph 121 are inconsistent with those alleged  
25          text messages, they are denied.

26          122. The contents of the alleged text message speak for themselves, and to  
27          the extent that the allegations in Paragraph 122 are inconsistent with that alleged  
28          text message, they are denied. Defendants are without knowledge or information

1 sufficient to form a belief as to the truth of the remaining allegations in Paragraph  
2 122 of the SAC, and therefore deny the same.

3 123. Deny.

4 124. The contents of the alleged text message speak for themselves, and to  
5 the extent that the allegations in Paragraph 124 are inconsistent with that alleged  
6 text message, they are denied. Defendants deny the remaining allegations in  
7 Paragraph 124 of the SAC.

8 125. The contents of the alleged text message speak for themselves, and to  
9 the extent that the allegations in Paragraph 125 are inconsistent with that alleged  
10 text message, they are denied.

11 126. Defendants are without knowledge or information sufficient to form a  
12 belief as to the truth of the allegations in the first sentence of Paragraph 126 of the  
13 SAC, and therefore deny the same. The police report alleged in Paragraph 126  
14 Footnote 11 speak for themselves, and to the extent that the allegations in  
15 Paragraph 126 regarding the alleged police report are inconsistent with that alleged  
16 police report, they are denied. Defendants deny the remaining allegations in  
17 Paragraph 126 of the SAC.

18 127. Deny.

19 128. Deny.

20 129. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 129 of the SAC, and therefore  
22 deny the same.

23 130. Defendants are without knowledge or information sufficient to form a  
24 belief as to the truth of the allegations in Paragraph 130 of the SAC, and therefore  
25 deny the same.

26 131. Deny.

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1           132. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 132 of the SAC, and therefore  
3 deny the same.

4           133. Deny.

5           134. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in Paragraph 134 of the SAC, and therefore  
7 deny the same.

8           135. Deny.

9           136. Defendants are without knowledge or information sufficient to form a  
10 belief as to the truth of the allegations in the first sentence of Paragraph 136 of the  
11 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
12 Paragraph 136 of the SAC.

13           137. Deny.

14           138. Defendants are without knowledge or information sufficient to form a  
15 belief as to the truth of the allegations in the first two sentences of Paragraph 138  
16 of the SAC, and therefore deny the same. Defendants deny the remaining  
17 allegations in Paragraph 138 of the SAC.

18           139. Deny.

19           140. Defendants are without knowledge or information sufficient to form a  
20 belief as to the truth of the allegations in Paragraph 140 of the SAC, and therefore  
21 deny the same.

22           141. Deny.

23           142. Deny.

24           143. Deny.

25           144. Deny.

26           145. Defendants are without knowledge or information sufficient to form a  
27 belief as to the truth of the allegations in Paragraph 145 of the SAC, and therefore  
28 deny the same.

1           146. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 146 of the SAC, and therefore  
3 deny the same.

4           147. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 147 of the SAC, and therefore  
6 deny the same.

7           148. Deny.

8           149. The contents of the alleged email speak for themselves, and to the  
9 extent that the allegations in Paragraph 149 are inconsistent with that alleged  
10 email, they are denied. Defendants deny the remaining allegations in Paragraph  
11 149 of the SAC.

12          150. Deny.

13          151. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 151 of the SAC, and therefore  
15 deny the same.

16          152. Deny.

17          153. Deny.

18          154. The contents of the alleged text message speak for themselves, and to  
19 the extent that the allegations in Paragraph 154 regarding the alleged text message  
20 are inconsistent with that alleged text message, they are denied. Defendants deny  
21 the remaining allegations in Paragraph 154 of the SAC.

22          155. The contents of the alleged text message speak for themselves, and to  
23 the extent that the allegations in Paragraph 155 are inconsistent with that alleged  
24 text message, they are denied. Defendants are without knowledge or information  
25 sufficient to form a belief as to the truth of the remaining allegations in Paragraph  
26 155 of the SAC, and therefore deny the same.

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1           156. The contents of the alleged text message speak for themselves, and to  
2 the extent that the allegations in Paragraph 156 are inconsistent with that alleged  
3 text message, they are denied.

4           157. The contents of the alleged text message speak for themselves, and to  
5 the extent that the allegations in Paragraph 157 regarding the alleged text message  
6 are inconsistent with that alleged text message, they are denied. Defendants deny  
7 the remaining allegations in Paragraph 157 of the SAC.

8           158. The contents of the alleged text messages speak for themselves, and to  
9 the extent that the allegations in Paragraph 158 regarding the alleged text messages  
10 are inconsistent with those alleged text messages, they are denied. Defendants are  
11 without knowledge or information sufficient to form a belief as to the truth of the  
12 remaining allegations in Paragraph 158 of the SAC, and therefore deny the same.

13           159. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 159 of the SAC, and therefore  
15 deny the same.

16           160. Defendants are without knowledge or information sufficient to form a  
17 belief as to the truth of the allegations in Paragraph 160 of the SAC, and therefore  
18 deny the same.

19           161. Deny.

20           162. Deny.

21           163. Deny.

22           164. Deny.

23           165. Deny.

24           166. Defendants are without knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 166 of the SAC, and therefore  
26 deny the same.

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1           167. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 167 of the SAC, and therefore  
3 deny the same.

4           168. Defendants deny The-Dream's control and abuse. Defendants are  
5 without knowledge or information sufficient to form a belief as to the truth of the  
6 remaining allegations in Paragraph 168 of the SAC, and therefore deny the same.

7           169. Deny.

8           170. Deny.

9           171. Deny.

10          172. Deny.

11          173. Deny.

12          174. Defendants are without knowledge or information sufficient to form a  
13 belief as to the truth of the allegations in the first sentence of Paragraph 174 of the  
14 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
15 Paragraph 174 of the SAC.

16          175. The contents of the alleged text messages speak for themselves, and to  
17 the extent that the allegations in Paragraph 175 are inconsistent with those alleged  
18 text messages, they are denied. Defendants deny the remaining allegations in  
19 Paragraph 175 of the SAC.

20          176. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 176 of the SAC, and therefore  
22 deny the same.

23          177. Deny.

24          178. Defendants are without knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 178 of the SAC, and therefore  
26 deny the same.

27          179. Deny.

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1           180. The contents of the alleged text message speak for themselves, and to  
2 the extent that the allegations in Paragraph 180 regarding the alleged text message  
3 are inconsistent with that alleged text message, they are denied. Defendants are  
4 without knowledge or information sufficient to form a belief as to the truth of the  
5 remaining allegations in Paragraph 180 of the SAC, and therefore deny the same.

6           181. The contents of the alleged contract speak for themselves, and to the  
7 extent that the allegations in Paragraph 181 are inconsistent with that alleged  
8 contract, they are denied.

9           182. The contents of the alleged contract speak for themselves, and to the  
10 extent that the allegations in Paragraph 182 are inconsistent with that alleged  
11 contract, they are denied.

12           183. The contents of the alleged contract speak for themselves, and to the  
13 extent that the allegations in Paragraph 183 are inconsistent with that alleged  
14 contract, they are denied.

15           184. The contents of the alleged contract speak for themselves, and to the  
16 extent that the allegations in Paragraph 184 regarding the alleged contract are  
17 inconsistent with that alleged contract, they are denied. The contents of the alleged  
18 text message speak for themselves, and to the extent that the allegations in  
19 Paragraph 184 regarding the alleged text message are inconsistent with that alleged  
20 text message, they are denied.

21           185. The contents of the alleged contract speak for themselves, and to the  
22 extent that the allegations in Paragraph 185 are inconsistent with that alleged  
23 contract, they are denied. Defendants deny the remaining allegations in Paragraph  
24 185 of the SAC.

25           186. Deny.

26           187. Defendants are without knowledge or information sufficient to form a  
27 belief as to the truth of the allegations in Paragraph 187 of the SAC, and therefore  
28 deny the same.

1           188. The contents of the alleged contract speak for themselves, and to the  
2 extent that the allegations in Paragraph 188 are inconsistent with that alleged  
3 contract, they are denied. Defendants deny the remaining allegations in Paragraph  
4 188 of the SAC.

5           189. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in the first sentence of Paragraph 189 of the  
7 SAC, and therefore deny the same. The contents of the alleged text message speak  
8 for themselves, and to the extent that the allegations in Paragraph 189 are  
9 inconsistent with that alleged text message, they are denied.

10           190. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 190 of the SAC, and therefore  
12 deny the same.

13           191. Deny.

14           192. Deny.

15           193. Defendants deny the allegations in the first sentence of Paragraph 193  
16 of the SAC. Defendants deny the allegations in the last sentence of Paragraph 193  
17 of the SAC. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the remaining allegations in Paragraph 193 of the SAC, and  
19 therefore deny the same.

20           194. Deny.

21           195. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in the first sentence of Paragraph 195 of the  
23 SAC, and therefore deny the same. The contents of the alleged text messages  
24 speak for themselves, and to the extent that the allegations in Paragraph 195  
25 regarding the alleged text messages are inconsistent with those alleged text  
26 messages, they are denied. Defendants deny the remaining allegations in  
27 Paragraph 195 of the SAC.

28   ///

1           196. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 196 of the SAC, and therefore  
3 deny the same.

4           197. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 197 of the SAC, and therefore  
6 deny the same.

7           198. Deny.

8           199. Defendants are without knowledge or information sufficient to form a  
9 belief as to the truth of the allegations in Paragraph 199 of the SAC, and therefore  
10 deny the same.

11           200. Defendants are without knowledge or information sufficient to form a  
12 belief as to the truth of the allegations in Paragraph 200 of the SAC, and therefore  
13 deny the same.

14           201. Deny.

15           202. Defendants are without knowledge or information sufficient to form a  
16 belief as to the truth of the allegations in Paragraph 202 of the SAC, and therefore  
17 deny the same.

18           203. The contents of the alleged text message speak for themselves, and to  
19 the extent that the allegations in Paragraph 203 regarding the alleged text message  
20 are inconsistent with that alleged text message, they are denied.

21           204. The contents of the alleged text messages speak for themselves, and to  
22 the extent that the allegations in Paragraph 204 regarding the alleged text messages  
23 are inconsistent with those alleged text messages, they are denied. Defendants are  
24 without knowledge or information sufficient to form a belief as to the truth of the  
25 remaining allegations in Paragraph 204 of the SAC, and therefore deny the same.

26           205. Deny.

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28       ///

1           206. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 206 of the SAC, and therefore  
3 deny the same.

4           207. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in the first two sentences of Paragraph 207  
6 of the SAC, and therefore deny the same. Defendants deny the remaining  
7 allegations in Paragraph 207 of the SAC.

8           208. The contents of the alleged text messages speak for themselves, and to  
9 the extent that the allegations in Paragraph 208 are inconsistent with those alleged  
10 text messages, they are denied.

11           209. The contents of the alleged text messages speak for themselves, and to  
12 the extent that the allegations in Paragraph 209 are inconsistent with those alleged  
13 text messages, they are denied.

14           210. The contents of the alleged email speak for themselves, and to the  
15 extent that the allegations in Paragraph 210 are inconsistent with that alleged  
16 email, they are denied. Defendants are without knowledge or information  
17 sufficient to form a belief as to the truth of the remaining allegations in Paragraph  
18 210 of the SAC, and therefore deny the same.

19           211. The contents of the alleged text message speak for themselves, and to  
20 the extent that the allegations in Paragraph 211 are inconsistent with that alleged  
21 text message, they are denied.

22           212. Deny.

23           213. Deny.

24           214. Deny.

25           215. Defendants are without knowledge or information sufficient to form a  
26 belief as to the truth of the allegations in Paragraph 215 of the SAC, and therefore  
27 deny the same.

28    ///

1           216. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 216 of the SAC, and therefore  
3 deny the same.

4           217. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 217 of the SAC, and therefore  
6 deny the same.

7           218. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth of the allegations in Paragraph 218 of the SAC, and therefore  
9 deny the same.

10          219. Deny.

11          220. Deny.

12          221. Deny.

13          222. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 222 of the SAC, and therefore  
15 deny the same.

16          223. Deny.

17          224. Deny.

18          225. Deny.

19          226. Deny.

20          227. Deny.

21          228. Deny.

22          229. Defendants are without knowledge or information sufficient to form a  
23 belief as to the truth of the allegations in Paragraph 229 of the SAC, and therefore  
24 deny the same.

25          230. Defendants are without knowledge or information sufficient to form a  
26 belief as to the truth of the allegations in Paragraph 230 of the SAC, and therefore  
27 deny the same.

28       ///

1           231. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in the first sentence of Paragraph 231 of the  
3 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
4 Paragraph 231 of the SAC.

5           232. The contents of the alleged text message speak for themselves, and to  
6 the extent that the allegations in Paragraph 232 of the SAC are inconsistent with  
7 that alleged text message, they are denied. Defendants deny the remaining  
8 allegations in Paragraph 232 of the SAC.

9           233. The contents of the alleged text messages speak for themselves, and to  
10 the extent that the allegations in Paragraph 233 of the SAC are inconsistent with  
11 those alleged text messages, they are denied. Defendants are without knowledge  
12 or information sufficient to form a belief as to the truth of the remaining  
13 allegations in Paragraph 233 of the SAC, and therefore deny the same.

14           234. Deny.

15           235. Deny.

16           236. Deny.

17           237. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 237 of the SAC, and therefore  
19 deny the same.

20           238. Deny.

21           239. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in Paragraph 239 of the SAC, and therefore  
23 deny the same.

24           240. Deny.

25           241. Deny.

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1           242. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in the second sentence of Paragraph 242 of  
3 the SAC, and therefore deny the same. Defendants deny the remaining allegations  
4 in Paragraph 242 of the SAC.

5           243. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in the first sentence of Paragraph 243 of the  
7 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
8 Paragraph 243 of the SAC.

9           244. Deny.

10          245. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in the second and third sentences of  
12 Paragraph 245 of the SAC, and therefore deny the same. Defendants deny the  
13 remaining allegations in Paragraph 245 of the SAC.

14          246. The contents of the alleged text messages speak for themselves, and to  
15 the extent that the allegations in Paragraph 246 regarding the alleged text messages  
16 are inconsistent with those alleged text messages, they are denied. Defendants are  
17 without knowledge or information sufficient to form a belief as to the truth of the  
18 remaining allegations in Paragraph 246 of the SAC, and therefore deny the same.

19          247. The contents of the alleged text messages speak for themselves, and to  
20 the extent that the allegations in Paragraph 247 are inconsistent with those alleged  
21 text messages, they are denied.

22          248. Defendants are without knowledge or information sufficient to form a  
23 belief as to the truth of the allegations in Paragraph 248 of the SAC, and therefore  
24 deny the same.

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1           249. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in the first sentence of Paragraph 249 of the  
3 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
4 Paragraph 249 of the SAC.

5           250. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in the first and second sentences of  
7 Paragraph 250 of the SAC, and therefore deny the same. Defendants deny the  
8 remaining allegations in Paragraph 250 of the SAC.

9           251. Defendants are without knowledge or information sufficient to form a  
10 belief as to the truth of the allegations in Paragraph 251 of the SAC, and therefore  
11 deny the same.

12           252. Defendants are without knowledge or information sufficient to form a  
13 belief as to the truth of the allegations in the first sentence of Paragraph 252 of the  
14 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
15 Paragraph 252 of the SAC.

16           253. Defendants are without knowledge or information sufficient to form a  
17 belief as to the truth of the allegations in Paragraph 253 of the SAC, and therefore  
18 deny the same.

19           254. Defendants are without knowledge or information sufficient to form a  
20 belief as to the truth of the allegations in Paragraph 254 of the SAC, and therefore  
21 deny the same.

22           255. Defendants are without knowledge or information sufficient to form a  
23 belief as to the truth of the allegations in Paragraph 255 of the SAC, and therefore  
24 deny the same.

25           256. Defendants deny any allegations in Paragraph 256 of the SAC that  
26 purport to set forth or describe any alleged conduct by Defendants. Defendants are  
27 without knowledge or information sufficient to form a belief as to the truth of the  
28 remaining allegations in Paragraph 256 of the SAC, and therefore deny the same.

1           257. Defendants deny any allegations in Paragraph 257 of the SAC that  
2 purport to set forth or characterize any alleged conduct by Defendants. Defendants  
3 are without knowledge or information sufficient to form a belief as to the truth of  
4 the remaining allegations in Paragraph 257 of the SAC, and therefore deny the  
5 same.

6           258. Defendants deny the allegations in the second sentence of Paragraph  
7 258 of the SAC. Defendants further deny any allegations in Paragraph 258 of the  
8 SAC that purport to set forth or characterize any alleged conduct by Defendants.  
9 Defendants are without knowledge or information sufficient to form a belief as to  
10 the truth of the remaining allegations in Paragraph 258 of the SAC, and therefore  
11 deny the same.

12           259. Defendants are without knowledge or information sufficient to form a  
13 belief as to the truth of the allegations in Paragraph 259 of the SAC, and therefore  
14 deny the same.

15           260. Defendants deny any allegations in Paragraph 260 of the SAC that  
16 purport to set forth or characterize any alleged conduct by Defendants. Defendants  
17 are without knowledge or information sufficient to form a belief as to the truth of  
18 the remaining allegations in Paragraph 260 of the SAC, and therefore deny the  
19 same.

20           261. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 261 of the SAC, and therefore  
22 deny the same.

23           262. Deny.

24           263. Deny.

25           264. Deny.

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27       ///

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1           265. The contents of the alleged text messages speak for themselves, and to  
2 the extent that the allegations in Paragraph 265 of the SAC are inconsistent with  
3 those alleged text messages, they are denied. Defendants deny the remaining  
4 allegations in Paragraph 265 of the SAC.

5           266. The contents of the alleged text messages speak for themselves, and to  
6 the extent that the allegations in Paragraph 266 of the SAC are inconsistent with  
7 those alleged text messages, they are denied. Defendants are without knowledge  
8 or information sufficient to form a belief as to the truth of the allegations in  
9 Paragraph 266 of the SAC, and therefore deny the same.

10           267. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 267 of the SAC, and therefore  
12 deny the same.

13           268. Deny.

14           269. Defendants are without knowledge or information sufficient to form a  
15 belief as to the truth of the allegations in Paragraph 269 of the SAC, and therefore  
16 deny the same.

17           270. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 270 of the SAC, and therefore  
19 deny the same.

20           271. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 271 of the SAC, and therefore  
22 deny the same.

23           272. The contents of the alleged text message speak for themselves, and to  
24 the extent that the allegations in Paragraph 272 are inconsistent with that alleged  
25 text message, they are denied.

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1           273. The contents of the alleged text message speak for themselves, and to  
2 the extent that the allegations in Paragraph 273 of the SAC are inconsistent with  
3 that alleged text message, they are denied. Defendants are without knowledge or  
4 information sufficient to form a belief as to the truth of the remaining allegations in  
5 Paragraph 273 of the SAC, and therefore deny the same.

6           274. Defendants are without knowledge or information sufficient to form a  
7 belief as to the truth of the allegations in Paragraph 274 of the SAC, and therefore  
8 deny the same.

9           275. Defendants are without knowledge or information sufficient to form a  
10 belief as to the truth of the allegations in Paragraph 275 of the SAC, and therefore  
11 deny the same.

12           276. Defendants are without knowledge or information sufficient to form a  
13 belief as to the truth of the allegations in Paragraph 276 of the SAC, and therefore  
14 deny the same.

15           277. Defendants are without knowledge or information sufficient to form a  
16 belief as to the truth of the allegations in Paragraph 277 of the SAC, and therefore  
17 deny the same.

18           278. Defendants are without knowledge or information sufficient to form a  
19 belief as to the truth of the allegations in Paragraph 278 of the SAC, and therefore  
20 deny the same.

21           279. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in Paragraph 279 of the SAC, and therefore  
23 deny the same.

24           280. Defendants are without knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 280 of the SAC, and therefore  
26 deny the same.

27 ///

28 ///

1           281. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 281 of the SAC, and therefore  
3 deny the same.

4           282. Deny.

5           283. Defendants deny the allegations in the first sentence of Paragraph 283  
6 of the SAC. Defendants further deny any allegations in Paragraph 283 of the SAC  
7 that purport to set forth or characterize any alleged conduct by Defendants.  
8 Defendants are without knowledge or information sufficient to form a belief as to  
9 the truth of the remaining allegations in Paragraph 283 of the SAC, and therefore  
10 deny the same.

11           284. Defendants deny any allegations in Paragraph 284 of the SAC that  
12 purport to set forth or characterize any alleged conduct by Defendants. Defendants  
13 are without knowledge or information sufficient to form a belief as to the truth of  
14 the remaining allegations in Paragraph 284 of the SAC, and therefore deny the  
15 same.

16           285. Defendants deny any allegations in Paragraph 285 of the SAC that  
17 purport to set forth or characterize any alleged conduct by Defendants. Defendants  
18 are without knowledge or information sufficient to form a belief as to the truth of  
19 the remaining allegations in Paragraph 285 of the SAC, and therefore deny the  
20 same.

21           286. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in Paragraph 286 of the SAC, and therefore  
23 deny the same.

24           287. Defendants are without knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 287 of the SAC, and therefore  
26 deny the same.

27           288. Defendants are without knowledge or information sufficient to form a  
28 belief as to the truth of the allegations in Paragraph 288 of the SAC, and therefore

1 deny the same.

2 289. Defendants are without knowledge or information sufficient to form a  
3 belief as to the truth of the allegations in Paragraph 289 of the SAC, and therefore  
4 deny the same.

5 290. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in Paragraph 290 of the SAC, and therefore  
7 deny the same.

8 291. Defendants are without knowledge or information sufficient to form a  
9 belief as to the truth of the allegations in Paragraph 291 of the SAC, and therefore  
10 deny the same.

11 292. Defendants are without knowledge or information sufficient to form a  
12 belief as to the truth of the allegations in Paragraph 292 of the SAC, and therefore  
13 deny the same.

14 293. Defendants are without knowledge or information sufficient to form a  
15 belief as to the truth of the allegations in Paragraph 293 of the SAC, and therefore  
16 deny the same.

17 294. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 294 of the SAC, and therefore  
19 deny the same.

20 295. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 295 of the SAC, and therefore  
22 deny the same.

23 296. Deny.

24 297. Defendants are without knowledge or information sufficient to form a  
25 belief as to the truth of the allegations in Paragraph 297 of the SAC, and therefore  
26 deny the same.

27 298. Defendants are without knowledge or information sufficient to form a  
28 belief as to the truth of the allegations in Paragraph 298 of the SAC, and therefore

1 deny the same.

2 299. Defendants are without knowledge or information sufficient to form a  
3 belief as to the truth of the allegations in Paragraph 299 of the SAC, and therefore  
4 deny the same.

5 300. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in Paragraph 300 of the SAC, and therefore  
7 deny the same.

8 301. Defendants are without knowledge or information sufficient to form a  
9 belief as to the truth of the allegations in Paragraph 301 of the SAC, and therefore  
10 deny the same.

11 302. Defendants are without knowledge or information sufficient to form a  
12 belief as to the truth of the allegations in Paragraph 302 of the SAC, and therefore  
13 deny the same.

14 303. Defendants are without knowledge or information sufficient to form a  
15 belief as to the truth of the allegations in Paragraph 303 of the SAC, and therefore  
16 deny the same.

17 304. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 304 of the SAC, and therefore  
19 deny the same.

20 305. Defendants are without knowledge or information sufficient to form a  
21 belief as to the truth of the allegations in Paragraph 305 of the SAC, and therefore  
22 deny the same.

23 306. Defendants are without knowledge or information sufficient to form a  
24 belief as to the truth of the allegations in Paragraph 306 of the SAC, and therefore  
25 deny the same.

26 307. Defendants are without knowledge or information sufficient to form a  
27 belief as to the truth of the allegations in Paragraph 307 of the SAC, and therefore  
28 deny the same.

1           308. Defendants are without knowledge or information sufficient to form a  
2 belief as to the truth of the allegations in Paragraph 308 of the SAC, and therefore  
3 deny the same.

4           309. Defendants are without knowledge or information sufficient to form a  
5 belief as to the truth of the allegations in Paragraph 309 of the SAC, and therefore  
6 deny the same.

7           310. Defendants are without knowledge or information sufficient to form a  
8 belief as to the truth of the allegations in Paragraph 310 of the SAC, and therefore  
9 deny the same.

10           311. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 311 of the SAC, and therefore  
12 deny the same.

13           312. Defendants are without knowledge or information sufficient to form a  
14 belief as to the truth of the allegations in Paragraph 312 of the SAC, and therefore  
15 deny the same.

16           313. Defendants are without knowledge or information sufficient to form a  
17 belief as to the truth of the allegations in Paragraph 313 of the SAC, and therefore  
18 deny the same.

19           314. Defendants deny the fourth sentence of Paragraph 314 of the SAC.  
20 Defendants are without knowledge or information sufficient to form a belief as to  
21 the truth of the remaining allegations in Paragraph 314 of the SAC, and therefore  
22 deny the same.

23           315. Defendants are without knowledge or information sufficient to form a  
24 belief as to the truth of the allegations in Paragraph 315 of the SAC, and therefore  
25 deny the same.

26           316. Deny.

27           317. Defendants deny any allegations in Paragraph 317 of the SAC that  
28 purport to set forth or characterize any alleged conduct by Defendants. Defendants



1 are without knowledge or information sufficient to form a belief as to the truth of  
2 the remaining allegations in Paragraph 317 of the SAC, and therefore deny the  
3 same.

4 318. Deny.

5 319. Defendants are without knowledge or information sufficient to form a  
6 belief as to the truth of the allegations in Paragraph 319 of the SAC, and therefore  
7 deny the same.

8 320. Deny.

9 321. Deny.

10 322. Defendants are without knowledge or information sufficient to form a  
11 belief as to the truth of the allegations in Paragraph 322 of the SAC, and therefore  
12 deny the same.

13 323. Deny.

14 324. Defendants are without knowledge or information sufficient to form a  
15 belief as to the truth of the allegations in Paragraph 324 of the SAC, and therefore  
16 deny the same.

17 325. Defendants are without knowledge or information sufficient to form a  
18 belief as to the truth of the allegations in Paragraph 325 of the SAC, and therefore  
19 deny the same.

20 326. Deny.

21 327. Defendants are without knowledge or information sufficient to form a  
22 belief as to the truth of the allegations in the first sentence of Paragraph 327 of the  
23 SAC, and therefore deny the same. Defendants deny the remaining allegations in  
24 Paragraph 327 of the SAC.

25 328. Defendants are without knowledge or information sufficient to form a  
26 belief as to the truth of the allegations in the first and third sentences of Paragraph  
27 328 of the SAC, and therefore deny the same. Defendants deny the remaining  
28 allegations in Paragraph 328 of the SAC.

**FIRST CLAIM FOR RELIEF**

**(Sex Trafficking Under 18 U.S.C. § 1595)**

329. Defendants repeat their responses and denials to the preceding and foregoing paragraphs as if fully set forth herein.

330. Paragraph 330 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 330 of the SAC.

331. Paragraph 331 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 331 of the SAC.

332. Paragraph 332 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 332 of the SAC.

333. Paragraph 333 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 333 of the SAC.

334. Paragraph 334 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 334 of the SAC.

335. Paragraph 335 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 335 of the SAC.

336. Paragraph 336 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 336 of the SAC.

337. Paragraph 337 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 337 of the SAC.

338. Paragraph 338 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 338 of the SAC.

339. Paragraph 339 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 339 of the SAC.

340. Paragraph 340 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 340 of the SAC.

341. Paragraph 341 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 341 of the SAC.

## SECOND CLAIM FOR RELIEF

**(Civil Sexual Assault)**

342. Defendants repeat their responses and denials to the preceding and foregoing paragraphs as if fully set forth herein.

343. Paragraph 343 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 343 of the SAC.

344. Paragraph 344 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 344 of the SAC.

345. Paragraph 345 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 345 of the SAC.

346. Paragraph 346 of the SAC states legal conclusions, to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 346 of the SAC.

1           347. Paragraph 347 of the SAC states legal conclusions, to which no  
2 response is required. To the extent that a response is required, Defendants deny  
3 the allegations in Paragraph 347 of the SAC.

4                           **PRAYER FOR RELIEF**

5           The prayer for relief does not require a response. To the extent a response is  
6 required, Defendants deny that Plaintiff is entitled to any relief whatsoever from  
7 Defendants or this Court, either as requested in the SAC or otherwise.

8                           **AFFIRMATIVE DEFENSES**

9           Defendants assert the following affirmative defenses without conceding that  
10 they bear the burden of proof as to any of the defenses pled. Defendants reserve  
11 the right to amend or supplement these defenses and to take further positions as  
12 discovery proceeds in this case.

13                           **FIRST AFFIRMATIVE DEFENSE**

14                           **(Failure To State A Claim)**

15           The SAC and each claim for relief alleged therein are barred, in whole or in  
16 part, because they fail to state any claim upon which relief can be granted.

17                           **SECOND AFFIRMATIVE DEFENSE**

18                           **(Laches)**

19           The SAC and each claim for relief alleged therein are barred, in whole or in  
20 part, by the doctrine of laches.

21                           **THIRD AFFIRMATIVE DEFENSE**

22                           **(Waiver, Estoppel, Acquiescence, Consent)**

23           The SAC and each claim for relief alleged therein are barred, in whole or in  
24 part, by the doctrines of waiver, estoppel, acquiescence, and/or consent.

25                           **FOURTH AFFIRMATIVE DEFENSE**

26                           **(Unclean Hands)**

27           The SAC and each claim for relief alleged therein are barred, in whole or in  
28 part, by the doctrine of unclean hands.

**FIFTH AFFIRMATIVE DEFENSE**

**(No Damages)**

The SAC and each claim for relief alleged therein are barred, in whole or in part, because there have been no damages in any amount, manner, or at all by reason of any act alleged against Defendants in the SAC.

**SIXTH AFFIRMATIVE DEFENSE**

**(Failure to Mitigate Damages)**

If Plaintiff has suffered any damages or injury in fact, which Defendants expressly deny, Defendants allege that Plaintiff's recovery is barred by her failure to mitigate, reduce, or otherwise avoid damages or injuries.

**SEVENTH AFFIRMATIVE DEFENSE**

**(Statute of Limitations)**

The SAC and each claim for relief alleged therein are barred, in whole or in part, by the applicable statute of limitations.

**EIGHTH AFFIRMATIVE DEFENSE**

**(Mistake Of Fact As To Consent)**

The SAC and each claim for relief alleged therein are barred, in whole or in part, by mistake of fact as to consent.

**NINTH AFFIRMATIVE DEFENSE**

**(Lack of Knowledge)**

The SAC and each claim for relief alleged therein are barred, in whole or in part, by lack of knowledge of the acts complained of in the SAC.

**TENTH AFFIRMATIVE DEFENSE**

Defendants assert that they may have other separate and additional defenses of which they are presently unaware and hereby reserve the right to assert these additional defenses as discovery warrants.

**JURY DEMAND**

Defendants hereby request a trial by jury pursuant to Rule 38 of the Federal

1 Rules of Civil Procedure.

2 Dated: May 28, 2025

VENABLE LLP

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